	Case 2:15-cv-01349-BJR Docum	nent 101	Filed 10/05/17	Page 1 of 2
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9	UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE			
10		11.1.2.0.2.2.2.2		
11	NORTHSHORE SHEET METAL, INC.,	Case No. 2:15-cv-01349 BJR		
12	Plaintiff,	DECLARATION OF		
13	v.	CHRISTOPHER L. HILGENFELD IN SUPPORT OF UNOPPOSED MOTION TO		
14	SHEET METAL WORKERS	AMENI	CASE SCHEDU	U LE
15	INTERNATIONAL ASSOCIATION, LOCAL 66,	1	n Motion Calend 13, 2017	ar:
16	Defendant.		10, 201	
17	Detendant.	J		
18	I, CHRISTOPHER L. HILGENFELD, declare as follows:			
19	1. I am over the age of eighteen (18) years and I am competent to testify if			
20	called upon to do so.			
21	2. I am an attorney with Davis Grimm Payne & Marra, counsel of record for			
22				
23	Plaintiff Northshore Sheet Metal, Inc. ("Northshore" or "Plaintiff"), and I make this			
24	declaration based upon my personal knowled	age.		
25				
	Hilgenfeld Declaration in Support of Unoppose	ed .	DAVIS CRIMM I	PAVNE & MARPA

Hilgenfeld Declaration in Support of Unopposed Motion to Amend Case Schedule - Page 1 Case No. 15-cv-01349 BJR

DAVIS GRIMM PAYNE & MARRA
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Seattle, WA 98104
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3. On March 22, 2017 a detailed public records request was made to the Port of Seattle. This request was made for any and all communications and other documents, relating to said communications beginning November 1, 2016, regarding or relating to Local 66, the Port of Seattle and Northshore Sheet Metal, Inc., along with other entities. We have received approximately 1,000 documents, and there are approximately 18,000 responsive documents that we are told require review for privilege. The request remains open and ongoing.

4. On June 16, 2017, several public records requests were made to the City of Seattle to the following departments: Finance & Administrative Services Dept.; Dept. of Planning & Community Development; Dept. of Labor Standards; and the Construction & Inspection Dept. These requests were for all communications and other documents, relating to said communications between Sheet Metal Workers International Association, Local 66 and the City of Seattle and Northshore with certain limitations. To date limited responses have been received from the Department of labor Standards, and the Department of Planning & Community Development.

I declare under penalty of perjury under the laws of the State of Washington and the United States that the foregoing statements are true and accurate.

Signed and dated at Seattle, Washington on this 5th day of October, 2017.

Christopher L. Hilgenfeld